UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 06 2014

REPLY TO THE ATTENTION OF:

VIA CERTIFIED MAIL 7009 1680 0000 7677 9708
RETURN RECEIPT REQUESTED

George Gatto, Sr.
President
Gatto Industrial Platers, Inc.
4620 West Roosevelt Road
Chicago, Illinois 60644-1430

Re: Notice of Violation
Gatto Industrial Platers, Inc.
EPA ID No.: ILD 984 832 311

Dear Mr. Gatto:

On May 31, 2013, a representative of the U.S. Environmental Protection Agency inspected the Gatto Industrial Platers, Inc. (hereinafter, "Gatto") facility located at 4620 West Roosevelt Road in Chicago, Illinois. The purpose of the inspection was to evaluate Gatto's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of our inspection report for your reference.

Based on information provided by Gatto, review of records, and personal observations made by the inspector at the time of the inspection, EPA has determined that Gatto is in violation of certain requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (CFR).

To be eligible for the exemption from having a hazardous waste storage permit, Gatto must be in compliance with the conditions of 35 IAC § 722.134(a) and (c) [40 CFR § 262.34(a) and (c)]. We find that Gatto was in noncompliance with the following conditions for a hazardous waste storage permit exemption and was in violation of the following requirements:

1. In order to avoid the need for a hazardous waste storage permit, a generator must comply with the requirements for owners and operators found at 35 IAC § 725.116, pursuant to 35 IAC § 722.134(a)(4) [40 CFR § 262.34(a)(4)]. This includes the need to ensure facility personnel take part in an annual review of their initial training and that training records on current personnel be kept until closure of the facility. See, 35 IAC § 725.116(c) and 35 IAC § 725.116(e), respectively [40 CFR § 265.16(c) and 40 CFR § 265.16(e), respectively].

At the time of the May 31, 2013 inspection, Gatto could provide training documentation for calendar years 2011 and 2012 only. In 2011, Gatto provided hazardous waste training to nine employees, including four employees named as emergency coordinators (primary or alternate) in the facility's contingency plan. In 2012, Gatto provided hazardous waste training to only four employees, including only one employee named as an alternate emergency coordinator in the facility's contingency plan.

Gatto, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the personnel training requirement.

2. A generator of hazardous waste may accumulate, without a permit or interim status, as much as 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste provided the container is marked with the words "Hazardous Waste" or with other words that identify the contents of the containers.

At the time of the May 31, 2013 inspection, Gatto was managing six (6) containers in the waste treatment area that were used to transport wastewater treatment sludge carrying the F006 listing from the waste treatment area to a 20-cubic yard roll-off container. Of these six (6) containers, two (2) were not marked with the words "Hazardous Waste" or with other words that identify the contents of the containers.

Gatto, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the satellite container labeling requirement.

The EPA inspector brought this to the attention of the Gatto representatives present. Gatto personnel corrected this at the time of the inspection by affixing hazardous waste labels to the two unmarked containers.

This matter was therefore resolved on the day of the inspection and no further action is required of Gatto with respect to the satellite container labeling requirement violation.

3. A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. See, 35 IAC § 733.113(d)(1) [40 CFR § 273.13(d)(1)].

On the day of the May 31, 2013 inspection, used fluorescent bulbs were stored in cardboard containers in a 2nd floor loft area in the south-central area of the facility. On the day of the inspection, several of these containers were observed and photo-documented to be open.

Gatto therefore failed to comply with the requirement to keep containers storing used lamps closed in violation of 35 IAC § 733.113(d)(1) [40 CFR § 273.13(d)(1)].

4. A small quantity handler of universal waste must ensure that each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste—Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." See, 35 IAC § 733.114(e) [40 CFR § 273.14(e)].

On the day of the May 31, 2013 inspection, used fluorescent bulbs were stored in cardboard containers in a 2nd floor loft area in the south-central area of the facility. On the day of the inspection, several of these containers were observed and photo-documented to not be labeled or clearly marked with the words: "Universal Waste—Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

Gatto therefore failed to comply with the requirement to keep containers storing used lamps closed in violation of 35 IAC § 733.114(e) [40 CFR § 273.14(e)].

5. A used oil generator is required to label or clearly mark with the words "Used Oil" any containers or tanks used to store used oil at the generator's facility. See, 35 IAC § 739.122(c)(1) [40 CFR § 279.22(c)(1)].

On the day of the May 31, 2013 inspection, one 250-gallon container and one 55-gallon drum, each containing used compressor oils, were not labeled or clearly marked with the words "Used Oil."

Gatto therefore failed to comply with the used oil generator labeling requirement in violation of 35 IAC § 739.122(c)(1) [40 CFR § 279.22(c)(1)].

6. A large quantity generator that accumulates hazardous waste on-site and does not meet the conditions for a hazardous waste permit exemption of 35 IAC § 722.134 [40 CFR § 262.34] is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See, 35 IAC §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 CFR §§ 270.1(c), and 270.10(a) and (d)]. Upon failing to meet the conditions for a hazardous waste permit exemption identified in item number 1 and 2 above, Gatto became an operator of a hazardous waste storage facility. Gatto has not applied for or received a hazardous waste storage permit nor does Gatto have interim status. Gatto's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 CFR §§ 270.1(c), and 270.10(a) and (d)].

At this time, EPA is not requiring Gatto to apply for a hazardous waste storage permit, so long as it immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Michael Valentino, EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Mr. Valentino, of my staff, at (312) 886-4582.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency (w/ enclosure)
(todd.marvel@Illinois.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

MEMORANDUM TO FILE

INSTALLATION NAME:	Gatto Industrial Platers, Inc.
U.S. EPA ID No.:	ILD 984 832 311
LOCATION ADDRESS:	4620 West Roosevelt Road Chicago, IL 60644
NAICS CODES:	332813 (Electroplating, Plating, Polishing, Anodizing and Coloring)
DATE OF INSPECTION:	May 31, 2013
EPA INSPECTOR:	Michael Valentino

PREPARED BY: Michael Valentino 10-28-14

Michael Valentino,
Environmental Engineer

Date

REVIEWED BY:

_____ _____

Michael Cunningham, Chief
Compliance Section 1
RCRA Branch

Date

Purpose of Inspection:

The purpose of the inspection was to perform an unannounced compliance evaluation inspection (CEI) at Gatto Industrial Platers, Inc. ("Gatto"), a large quantity generator of hazardous waste, to determine its compliance with the Resource Conservation and Recovery Act, specifically the Standards Applicable to Generators of Hazardous Waste, Standards for Land Disposal Restrictions, and Management of Used Oil set forth at 35 Illinois Administrative Code (IAC), Title 35: Environmental Protection, Subtitle G: Waste Disposal, Chapter I: Pollution Control Board, and Title 40 of Code of Federal Regulations (40 CFR) Parts 262 to 265, 268 and 279, respectively.

Participants:

George Gatto, Jr. (773-287-0100 ext. 252; g.gattojr@gattoplaters.com) and Andrew Gruda, Technical Director, (gruda@gattoplaters.com) represented Gatto. Michael Valentino represented U.S. EPA Region 5, Land and Chemicals Division, RCRA Branch.

Installation Description:

Gatto is a large electroplating facility, occupying more than 200,000 square feet of office, production, warehouse, packaging, shipping/receiving, utility and lab space. Gatto serves a wide array of industrial clients including the automotive, telecommunications, aerospace and electronics industries. Gatto also has military contracts. Gatto engages in zinc plating, zinc-nickel plating and aluminum treatment (aluminum chromate conversion coating). Gatto electroplates or treats parts of all different sizes and types. Most of the zinc plating is done on steel parts; other zinc plating is done on brass. Gatto uses both trivalent and hexavalent chromium in its processes, with about 30% of finishes using trivalent chromium.

Gatto is located in an industrial-residential area on Chicago's far west side, less than one-third mile south of Interstate 290 (Eisenhower Expressway) and less than one-fifth mile east of Illinois Rt. 50 (Cicero Avenue). The nearest residences are one-eighth mile east and southwest of and less than one-fourth mile north of the facility. Gatto is bordered to the north and east by a rail spur, to the south by Roosevelt Road and to the west by Gardner-Gibson Manufacturing & Warehousing and Gardner Asphalt Corp. Gatto is located in an Environmental Justice area.

Gatto generates one waste stream at this facility – wastewater treatment sludge carrying waste code F006. Wastewater treatment sludge is transported in roll-off boxes to Envirite of Illinois, Inc. ("Envirite") in Harvey, Illinois for solidification and stabilization prior to placement in a landfill.

Most of the zinc plating done at Gatto utilizes cyanide. Gatto incorporates cyanide destruction via oxidation with sodium hypochlorite as the first step in its wastewater treatment system. Spills from plating baths are held within containment beneath the plating lines and are pumped to the wastewater treatment system.

Gatto has 70 full-time employees at this location. Gatto operates two 10-hour shifts per day (5:00 am to 1:00 am), Monday through Friday. Three plating lines run during the first shift while only one line runs during the second shift. Gatto is only open on Saturdays for its maintenance crew. Gatto has been at its current location since the mid 1970's. Gatto is a family owned business.

Opening Conference:

I arrived at the facility at 9:15 am CDT on Friday, May 31, 2013. I entered the entrance facing Roosevelt Road. There was a waiting area off to the left and an open office area further down the hallway. Individual offices were located down a hall to the right. I did not see anyone in the open office area and so I proceeded down the hall leading to private offices. I encountered a female employee in her office and showed her my enforcement credentials and informed her that I was there to do an unannounced inspection of the facility. She attempted to reach George Gatto, Jr. through the intercom system. She asked that I wait in the waiting area and she would continue to try to reach Mr. Gatto. After ten minutes passed, I walked to her office and asked if she was able to reach Mr. Gatto. She asked a gentleman who was walking past if he had seen Mr. Gatto. I believe he told her that he saw him on the floor (*i.e.*, in the production area or warehouse – somewhere other than the office area). After several more minutes passed, Mr. Gatto and Mr. Andrew Gruda arrived. It was now 9:30 am. We sat at a conference table near the open office area. I presented my enforcement credentials at that time and we exchanged business cards.

I informed Messrs. Gatto and Gruda of the nature of my visit. I explained to them that I wanted to tour the facility and observe any areas where hazardous waste was generated or stored and that I would want to review documents. I then described to them what documents I would want to review. I informed Mr. Gatto that I would take photos during the course of the inspection and asked that he alert me to any process he would consider to be proprietary and I would make efforts to avoid getting such process equipment in the photo. He did not think there would be a problem with confidentiality.

Mr. Gatto gave me a general overview of operations, some of which is incorporated above under "Installation Description." Wastewater treatment sludge, which carries the F006 listing, is sent to Envirite in Harvey, Illinois. Spent acids are used to adjust the pH of plant wastewaters. Used oil is stored in one tank[1] and is shipped offsite under a bill of lading.

Gatto operates five filter presses as part of its wastewater treatment process. Gatto generates approximately 20 cubic yards of wastewater treatment sludge from electroplating operations each week.[2]

[1] As discussed below, since the tank is not fixed in place but can be moved it is, in actuality, a container and not a tank.

[2] This figure is slightly high. The 2012 annual report shows 800 cubic yards of F006 generated, which amounts to 40 roll-off boxes. Assuming 50 operating weeks per work year, it will take a little more than six

Following cyanide destruction, wastewater is treated to remove metals through the addition of sodium hydroxide and the precipitation of metal hydroxides. Cationic polymers are added to aid in metals precipitation. Wastewater is sent to a clarifier where metals are removed through flocculation and settling. Wastewater is further polished in a sand filter to remove remaining solids and is discharged via Outfall 2A.

Records Review:

At the conclusion of the opening meeting, Messrs. Gatto and Gruda and I proceeded to the lab where Mr. Gruda keeps records. There I conducted the records review portion of the inspection. Mr. Gruda gathered documents and directed me to a desk where I began my review at 10:00 am CDT.

The following narrative summarizes the documents I reviewed on the day of the inspection.

MWRDGC Discharge Authorization Permit

I reviewed Gatto's effluent discharge permit issued by the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC), Discharge Authorization No. 12719-4.1. The MWRDGC permit was renewed under Discharge Authorization No. 12719-5 with an effective date of August 1, 2007 and expiration date of May 14, 2017.

Gatto has one sampling point (Sample Pt. 2A), located at an indoor manhole inside of a sampling room at the south end of the truck dock. The MWRDGC samples semi-annually for the following parameters: cadmium, chromium (total), copper, cyanide (total), cyanide (amenable to chlorination), FOG (total), chromium (Cr^{6+}), iron, lead, mercury, nickel, silver, zinc, pH and total toxic organics (TTO).

Effluent is discharged to MWRDGC's treatment plant on West Pershing Road in Stickney, Illinois.

Hazardous Waste Manifests

I reviewed hazardous waste manifests from 2010, 2011, 2012 and 2013. Manifests were filled out and signed by Mr. Gruda, Rodrigo Roman and Rodrigo Tapia on behalf of Gatto. According to Mr. Gatto, Mr. Tapia is no longer employed by Gatto. The manifests were filled out properly. The manifests were for shipments of F006 wastewater treatment sludge and the most recent year's worth of manifests referenced waste profile no. 13623 (by Envirite of Illinois). I asked for and received a copy of the Envirite waste profile along with a copy of waste profile 10918987 (by Siemens). Signed facility copies

work days to accumulate a full roll-off of wastewater treatment sludge (compared to a work week consisting of five operating days).

were received by Gatto within 35 days of shipment. All shipments for this period were sent to Envirite of Illinois.*Annual Hazardous Waste Reports*

I asked for and received the three most current annual reports. The three reports were dated February 23, 2011; February 23, 2011 [*sic*] (should be February 23, 2012); and February 21, 2013 for waste generated in calendar years 2010, 2011 and 2012, respectively. The annual reports identified Gatto's NAICS code as 332813. The only waste stream was wastewater treatment sludge with waste code F006. Waste generation for years 2010, 2011 and 2012 were 740 cubic yards, 780 cubic yards and 800 cubic yards, respectively.

Weekly Inspection Logs

I received weekly container inspection logs for the period 2007 through 2013. I found these to be complete and in satisfactory order.

Contingency Plan

I asked for the facility's contingency plan and received a copy of Gatto's "Contingency Plan and Emergency Response," (2012). George Gatto, Sr. is listed as the primary emergency coordinator. Alternate emergency coordinators in the 2012 plan are Mr. Gruda, Rafael Guzman and Jack McCay.

I found that the contingency plan contained the major elements as required by 35 IAC § 725.152 [40 CFR § 265.52].

RCRA Training

I requested personnel training records for the most recent three-year period and Mr. Gruda produced training records for 2011 and 2012. Training for 2013 had not yet been conducted as of the date of the inspection. Training for 2010 was not produced.

Training in 2011 was provided to Gatto employees on April 27, 2011. Accu-Labs, Inc. conducted the training, the title of which was "Accu-Labs Environmental Compliance Seminar." I reviewed the contents of the training seminar and found that they meet the requirements of 35 IAC § 725.116(a) [40 CFR § 265.16(a)]. The 2011 training did not include employee responsibilities and position descriptions according to 35 IAC § 725.116(d) [40 CFR § 265.16(d)].The following Gatto employees received training in 2011: Ignacio Bernal, Rafael Guzman, Jack McCay, George Gatto, Sr., George Gatto, Jr., Rodrigo Roman, Israel Tapia, Andrew Gruda and Cayetano Herrera. Of those listed, Messrs. Guzman, McCay, Gruda and Gatto, Sr. are listed as emergency contacts in the contingency plan.

Training in 2012 was provided to Gatto employees on April 12, 2012. Scientific Control Laboratories, Inc. ("SCL") conducted the training. I reviewed the contents of the training materials and found them to be in conformance with35 IAC § 725.116(a) [40 CFR §

265.16(a)]. The 2012 training included assigned responsibilities and position titles per 35 IAC § 725.116(d) [40 CFR § 265.16(d)]. These Gatto employees, along with their position titles, were trained in 2012: Andrew Gruda, Technical Manager; Ca[s]etano Herrera, Waste Treatment Operator; Ignacio Bernal, Foreman-Maintenance; and Fernando Florez, Assistant Foreman-Maintenance. Absent from 2012 training were emergency coordinators McCay, Gatto, Sr., and Guzman.

While I found the training materials offered by both Accu-Labs, Inc. and SCL to be comprehensive, I did find the fact that fewer employees were trained in 2012 (four) than in 2011 (nine) to be an area of concern, as was the lack of documentation for training from 2010 and prior.

For the two years prior to my inspection (2011 and 2012), training took place in April. I conducted my inspection at the end of May 2013, and as such, more than 13 months had elapsed since the previous training was conducted.

TRI Inventory – EPCRA Form R

Because Gatto uses cyanides in its plating operations and destroys cyanide onsite in its wastewater treatment process, I reviewed the facility's EPCRA Form R (for year 2011). I also reviewed the facility's historical release information from EPA's website.[3]

In 2011, on its Form R Gatto reported 981 pounds of cyanide compounds (mostly in the form of nonreactive ferrous cyanide)[4] were transferred to Envirite. EPA's database shows 999, 803, 931 and 992.5 pounds of cyanide compounds transferred to Envirite in calendar years 2008, 2009, 2010 and 2012, respectively.

Also, on its 2011 Form R, Gatto reported 94.45 pounds of cyanide compounds transferred to the Stickney wastewater treatment works plant. EPA's database shows 80.25, 81.67, 69.9 and 89.84 pounds of cyanide compounds transferred to the Stickney POTW in calendar years 2008, 2009, 2010 and 2012, respectively.

Gatto's wastewater treatment (cyanide destruction process within its overall wastewater treatment process) destroyed 20,145 pounds and 25,795 pounds of cyanide in 2011 and 2012, respectively.

Based on its TRI data, Gatto's wastewater treatment system destroyed 94.9% and 96% of the total cyanide entering the system, on a mass basis, for calendar years 2011 and 2012, respectively.[5]

I completed my review of the above documents at 11:10 am CDT. We began the site walk-through immediately after the conclusion of my review of facility records. Mr.

[3] See http://iaspub.epa.gov/enviro/tris_control.tris_print?tris_id=60650GTTND4620R
[4] Per Andrew Gruda, in Email to Michael Valentino, EPA, February 21, 2014 at 2:00 pm CST.
[5] For 2011: 20,145 lb/(20,145 + 94.45 + 981) lb = 0.949, or 94.9% destruction efficiency. For 2012: 25,795 lb/(25,795 + 89.94 + 992.5) lb = 0.9597, or 96% destruction efficiency.

Gatto had stepped out during the records review but Mr. Gruda called him and he returned to the lab. The three of us toured the facility together.

Facility Inspection and Observations:

Messrs. Gatto and Gruda and I began the site walk-through at approximately 11:15 am CDT. During the course of the walk-through, I took eleven (11) photographs on a Nikon Coolpix® P4 digital camera with 8.1 megapixel resolution between 11:35 am and 12:01 pm CDT on May 31, 2013. These photos are found in Attachment No. 1 to this report. They are true and representative of the conditions I observed at the installation on the date of the CEI.[6]

We began the site tour in the wastewater treatment area. (Photos 1-4) I observed a plate-and-frame filter press and beneath it was a container – closed and properly labeled – holding filter press sludge (F006). (Photo 1)

I also observed an open-top below ground tank in which process waters from the facility's plating lines are treated with sodium hypochlorite (NaClO) to oxidize cyanide in the plating solution. (Photo 2)

Gatto uses five plate-and-frame filter presses and has six wastewater treatment sludge containers for transferring sludge from the filter presses to a roll-off box for offsite shipment. These containers serve as satellite accumulation containers. When filled, Gatto workers carry them by fork lift and deposit their contents into a roll-off box dedicated to storing and transporting off-site wastewater treatment sludge (Photo 11). The containers are constructed of welded steel diamond plate. I estimate that these filter press containers have a capacity of roughly 60 cubic feet (450 gallons)[7]. During the walk-through I observed two filter press containers that did not have hazardous waste labels. I brought this to the attention of Messrs. Gatto and Gruda. A Gatto employee placed hazardous waste labels on these two containers during the course of the inspection. I also observed that these containers were not covered, as was the first container I had observed (see above narrative). The two containers in this area which held sludge in them were not being added to or removed from at the time of the inspection. (Photos 1, 3)

I observed a small "tank" which Mr. Gruda told me held used hydraulic oils from compressors. Mr. Gatto said that the tank holds 250 gallons. I observed that it was not a stationary device (*rf.* 40 CFR § 260.10) and although it has the capacity of four 55-gallon drums it can be moved and would more accurately be referred to as a container. This container was observed to be open and missing the words, "used oil." A 55-gallon drum

[6] One photo was adjusted for brightness only. This was Photo 3. *Rf.* Attachment No. 1, pg. 5.

[7] Based on my on-site observations and analysis of inspection photos, the containers are approximately 18 inches high by eight feet wide by five feet deep. This yields a volume of 60 cubic feet. Using an estimate of 7.5 gallons/cubic ft gives a wet volume of around 450 gallons. It would therefore take about nine of these satellite containers to fill one 20-cubic yard roll-off box: 20 cu yd * 27 cu ft/cu yd = 540 cu ft per roll-off box; 540 cu ft/60 cu ft/satellite container = 9 containers.

containing oil had a sheet of plastic wrap over its top. The plastic wrap alone would not prevent spillage if the drum were to be tipped. (Photo 5)

We proceeded to a loft area immediately above where the used oil containers were located. Here I observed open boxes of fluorescent light bulbs, some of which were new and some of which appeared to be used. The boxes which held the lamps which appeared to be used were not marked with any wording indicating they were used. (Photos 6-10)

We concluded the inspection by observing a roll-off box (20 cubic yard container[8]) which was awaiting shipment. (Photo 11) The roll-off contained wastewater treatment sludge (F006). The roll-off was lined with a plastic liner and it was closed with a securely fastened tarp over it. A hazardous waste label was filled out and attached to the roll-off inside of a clear plastic sleeve. Envirite's phone number was also clearly marked on the side of the roll-off. I did not observe any spillage on the ground around or near the roll-off. I observed that the condition of the floor was generally good with no cracks or gaps. There was no evidence of spillage of filter press sludge on the ground in this area. The roll-off had some surface rust but appeared to be in good condition and properly managed.

Exit Conference:

At the completion of the site walk-through, Messrs. Gatto and Gruda and I returned to the conference table were we began the day.

I summarized my findings with Messrs. Gatto and Gruda and asked if they had any questions for me. They did not.

Before leaving, I presented Mr. Gatto with copies of the Region 5 Pollution Prevention (P2) contact information and State Agency P2 contact information fact sheet and the Illinois Waste Management and Research Center (WMRC) brochure entitled, "SUSTAINABLE SOLUTIONS – A COOPERATIVE PROGRAM FOR ILLINOIS INDUSTRY."

I left the site at approximately 12:20 pm.

Attachments:

1. Photo Log

[8] The size of the roll-off is based on information gathered by the inspector during the opening conference and upon the inspector's own experience.

ATTACHMENT NO. 1
PHOTO LOG – MAY 31, 2013
GATTO INDUSTRIAL PLATERS, INC. CHICAGO IL

PHOTO NO.	DATE	TIME	PHOTOGRAPHER	DESCRIPTION
1	5/31/13	11:35 am	M. Valentino	Plate and frame filter press and wastewater treatment sludge (F006) container. Container is labeled and covered. Plating sludge is transferred from containers such as this one to a roll-off box (see Photo 11).
2	5/31/13	11:37 am	M. Valentino	Cyanide destruction tank. Sodium hypochlorite is metered in to chlorinate hydrogen cyanide to form carbon dioxide and nitrogen.
3	5/31/13	11:42 am	M. Valentino	Waste treatment area. Two more plate and frame filter presses along with six F006 containers (two of which are not shown in this photo). The filter press to the right of the photo was the one in most recent use at the time of the photo. The container beneath it was filled to capacity. Two of the six F006 containers observed in this room were not affixed with hazardous waste labels, while four were. Gatto personnel corrected this at the time of the inspection by affixing hazardous waste labels to the two unmarked containers. These containers are interpreted to be satellite accumulation containers because F006 sludge is generated as it is pressed in the filter press and deposited into these containers. The containers are then transferred to the roll-off box area and the contents are deposited into the roll-off for off-site transport to Envirite. The container to the right of the photo, beneath the filter press, was interpreted by the inspector to have been filled to capacity and that no more addition of sludge was taking place at the time it was observed to be uncovered. The container in the center background of the photo was more than 3/4th filled with sludge and was also uncovered at the time the photo was taken.
4	5/31/13	11:44 am	M. Valentino	Waste treatment area. Clarifier tank (settling of metal hydroxides).
5	5/31/13	11:58 am	M. Valentino	Used oil storage location. Large container (250 gal) and drum (55 gal) are not marked with the words "used oil." The large container's lid is not secure; the 55 gal drum is covered with plastic wrap and is also not secured against spillage.
6	5/31/13	11:58 am	M. Valentino	Used fluorescent light bulb storage area. There is a mix of used and new lamps in this area. Boxes containing used lamps are not securely closed nor labeled.
7	5/31/13	11:58 am	M. Valentino	Used fluorescent light bulb storage area. There is a mix of used and new lamps in this area. Boxes containing used lamps are not securely closed nor labeled.
8	5/31/13	11:58 am	M. Valentino	Used fluorescent light bulb storage area. There is a mix of used and new lamps in this area. Boxes containing used lamps are not securely closed nor labeled.
9	5/31/13	11:58 am	M. Valentino	Used fluorescent light bulb storage area. There is a mix of used and new lamps in this area. Boxes containing used lamps are not securely closed nor labeled.

PHOTO NO.	DATE	TIME	PHOTOGRAPHER	DESCRIPTION
10	5/31/13	11:58 am	M. Valentino	Used fluorescent light bulb storage area. There is a mix of used and new lamps in this area. Boxes containing used lamps are not securely closed nor labeled.
11	5/31/13	12:01 pm	M. Valentino	Roll-off (20 cu yd) of wastewater treatment sludge (F006) awaiting shipment. The container is covered, secured and properly labeled. There was no evidence of spillage around the roll-off.

PHOTO 1

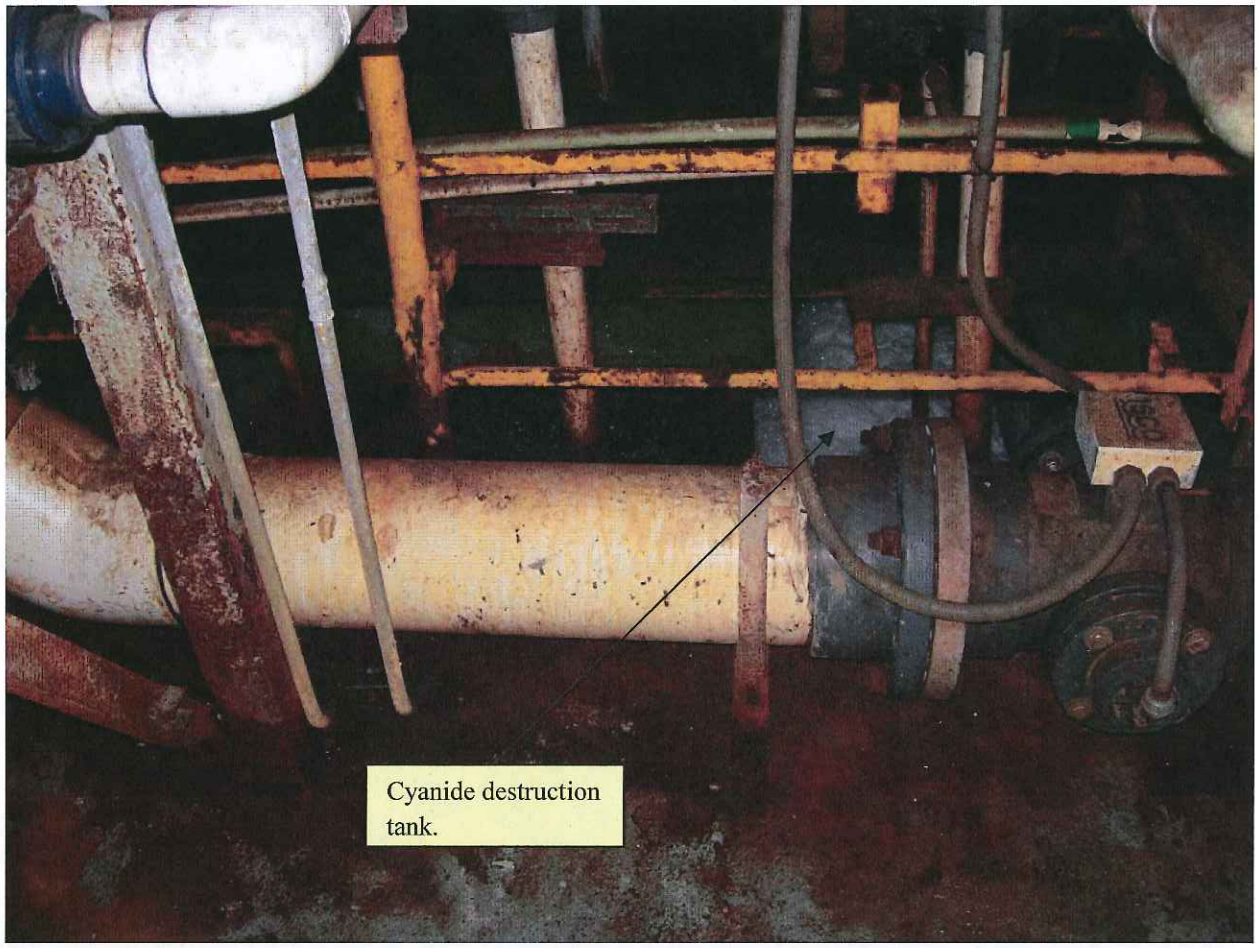

PHOTO 2

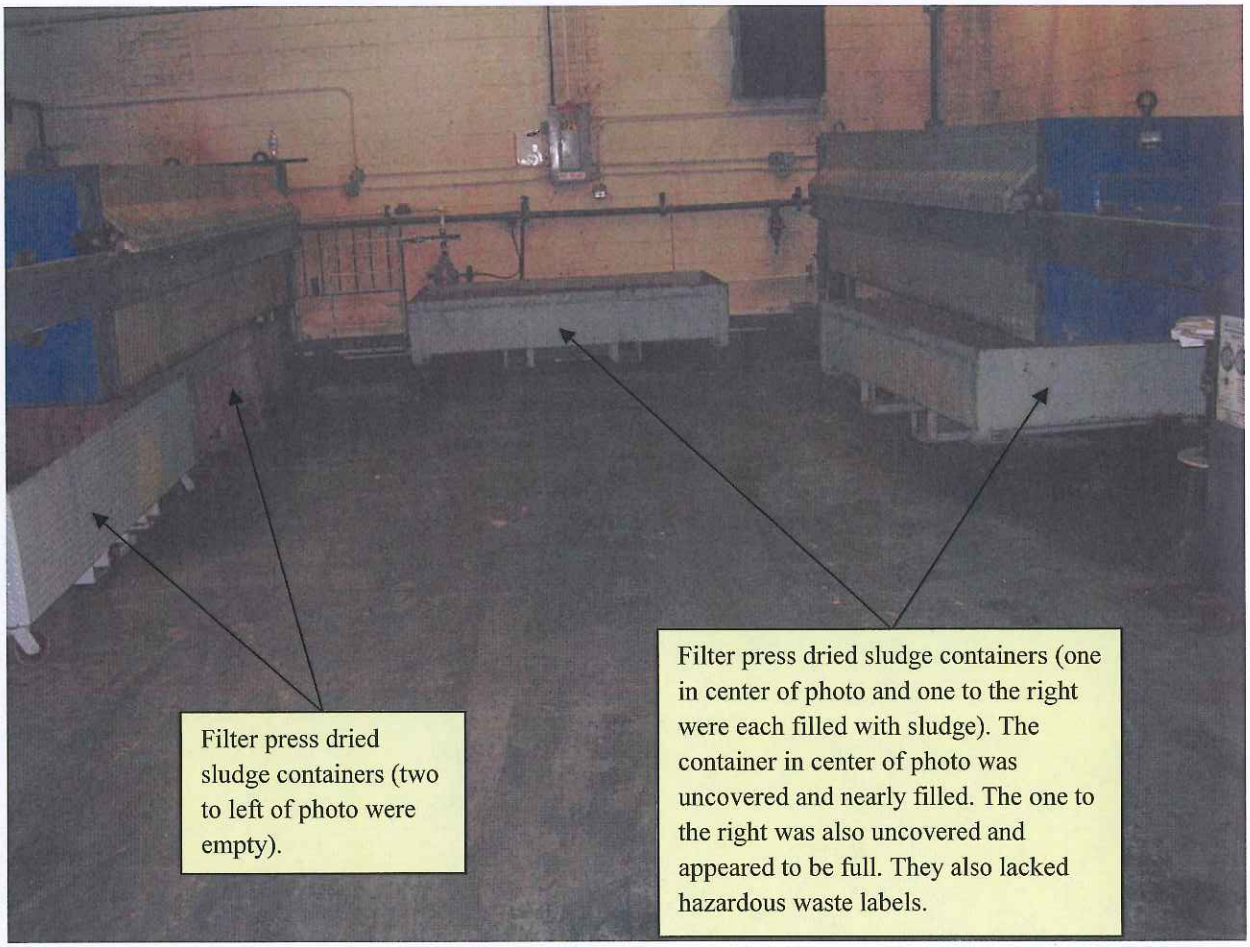

PHOTO 3

Note: This photo was modified from the original taken by the inspector. The inspector did not have his flash on when the photo was taken. The photo's brightness was adjusted by the inspector to make the containers and filter presses more visible to the reader. The room was not well lit. No other features of the photo were changed.

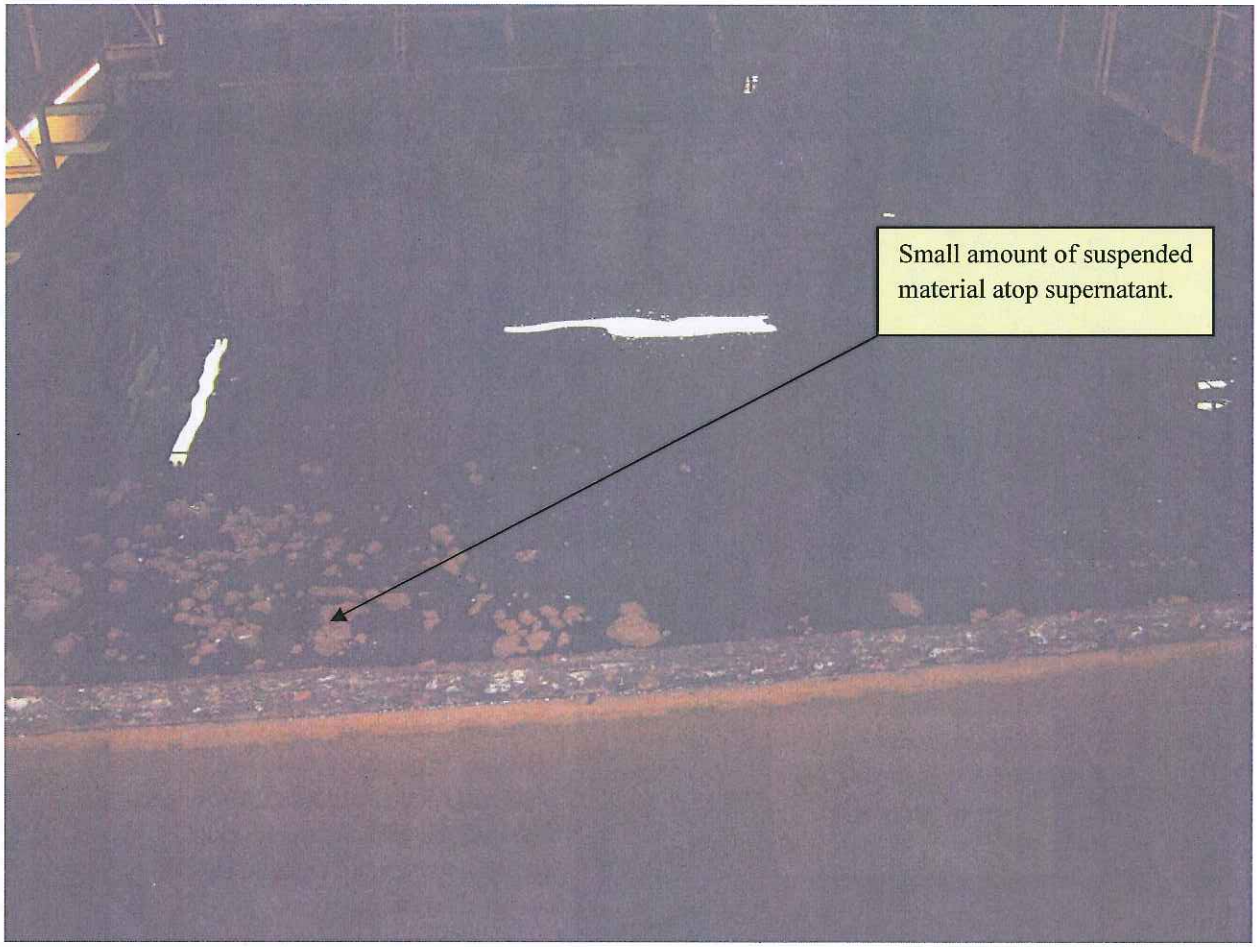

PHOTO 4

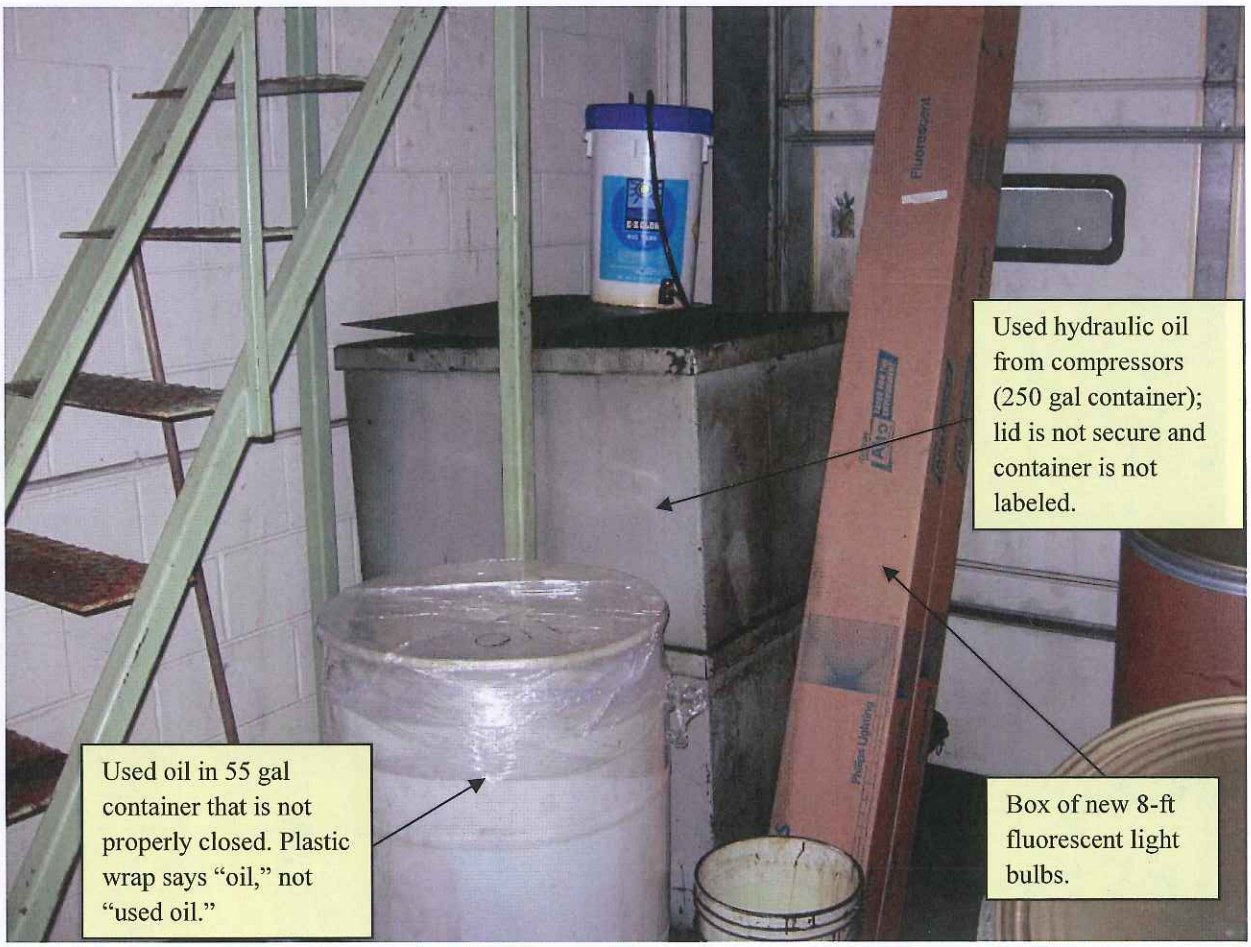
Used hydraulic oil from compressors (250 gal container); lid is not secure and container is not labeled.
Used oil in 55 gal container that is not properly closed. Plastic wrap says "oil," not "used oil."
Box of new 8-ft fluorescent light bulbs.

PHOTO 5

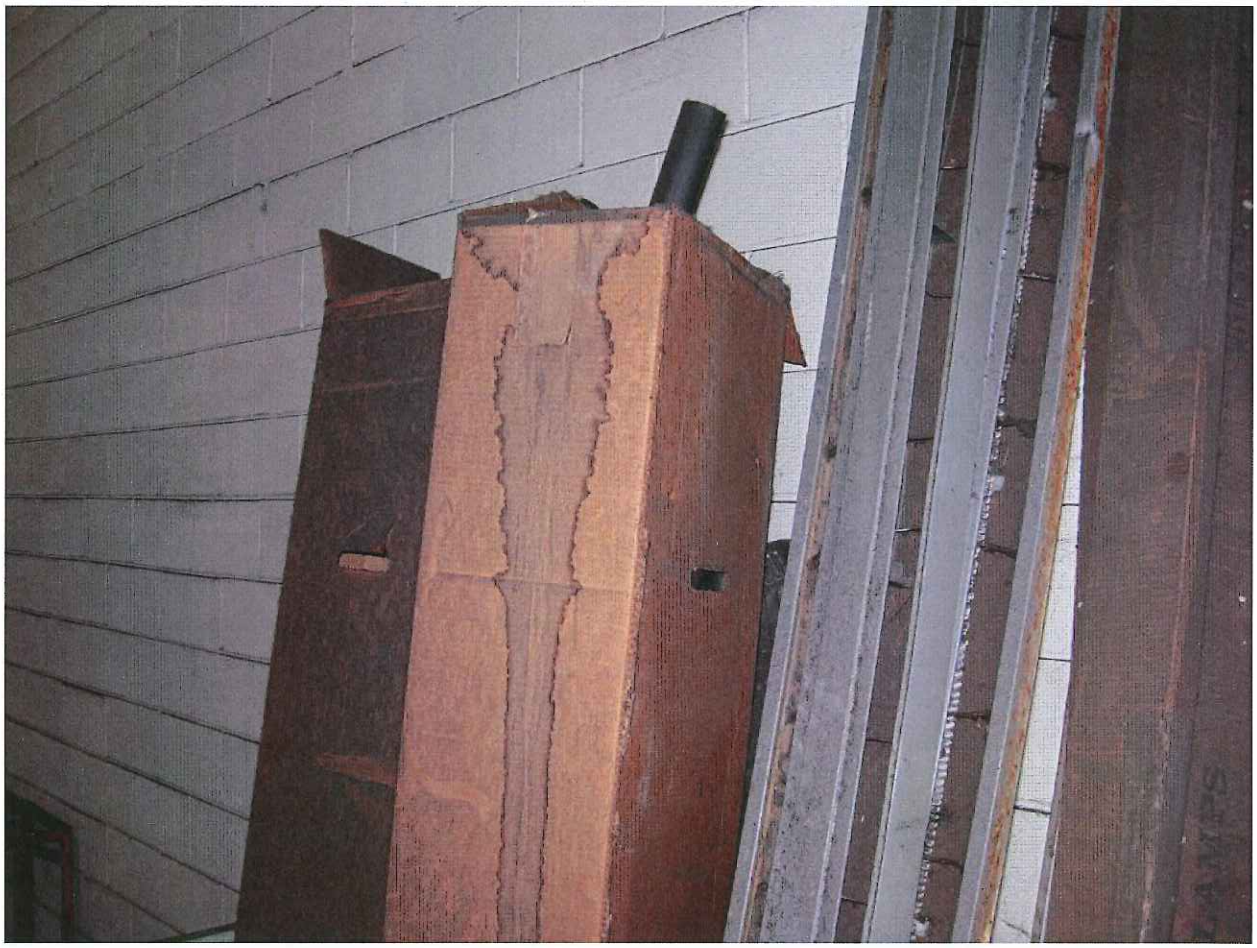

PHOTO 6

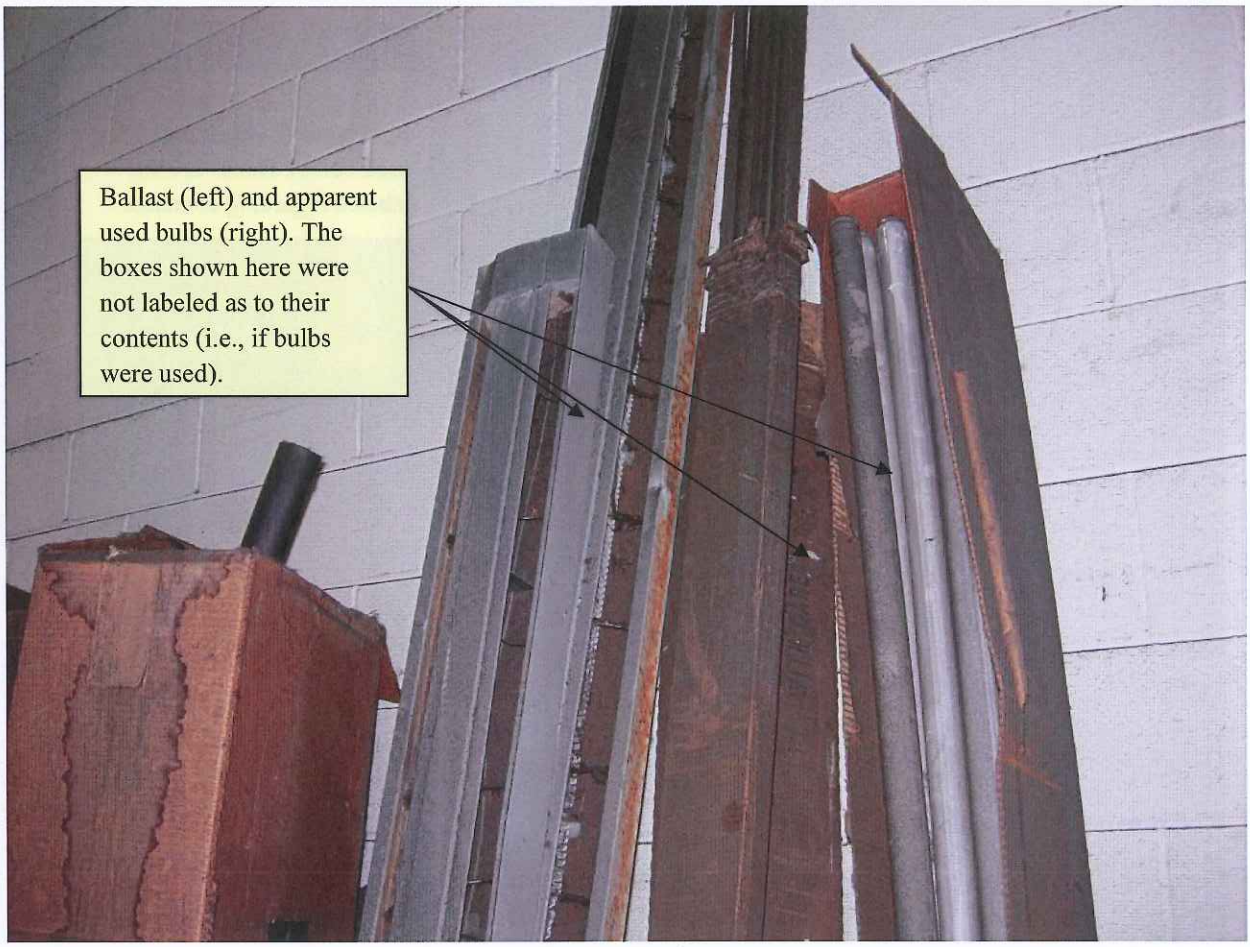
Ballast (left) and apparent used bulbs (right). The boxes shown here were not labeled as to their contents (i.e., if bulbs were used).

PHOTO 7

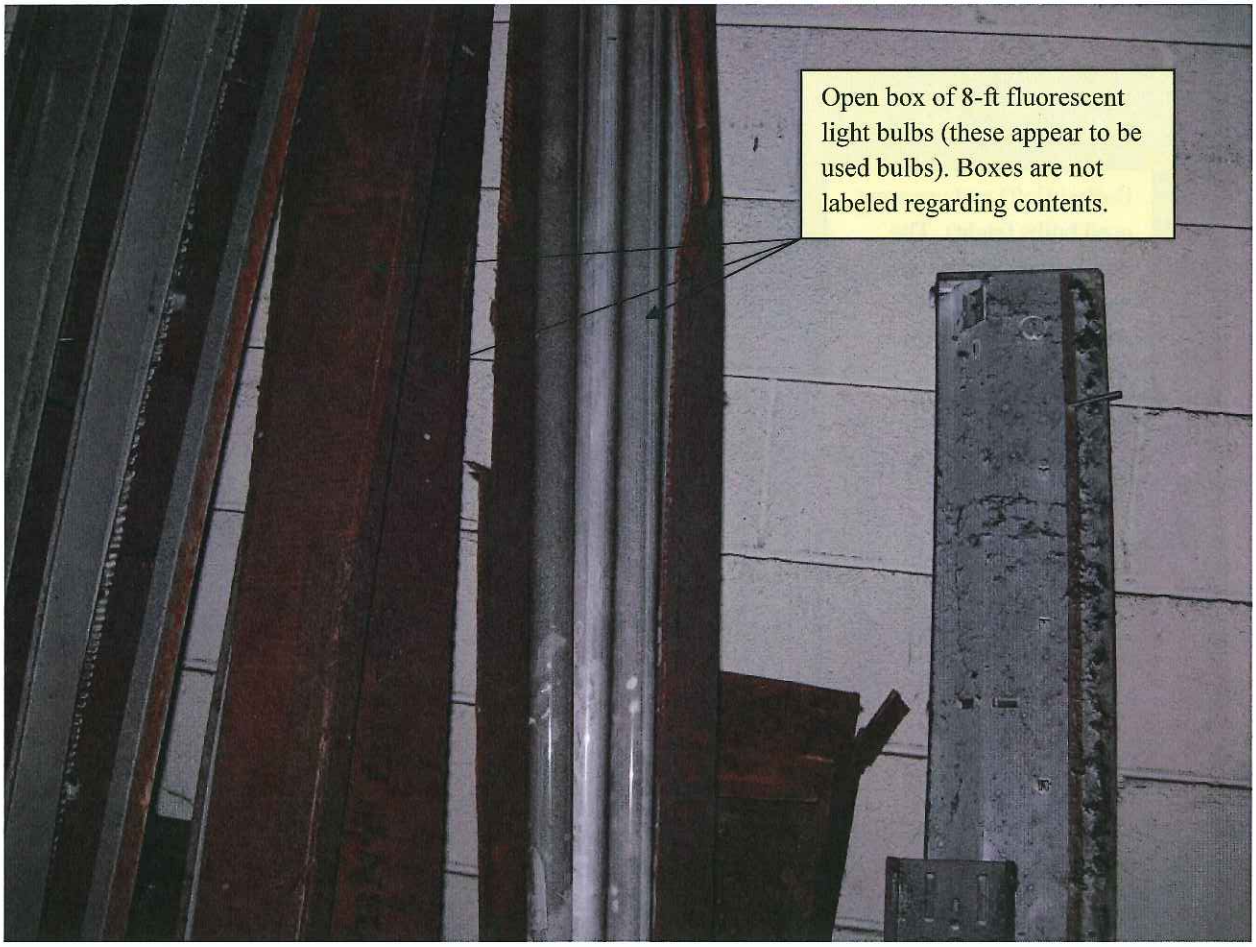
Open box of 8-ft fluorescent light bulbs (these appear to be used bulbs). Boxes are not labeled regarding contents.

PHOTO 8

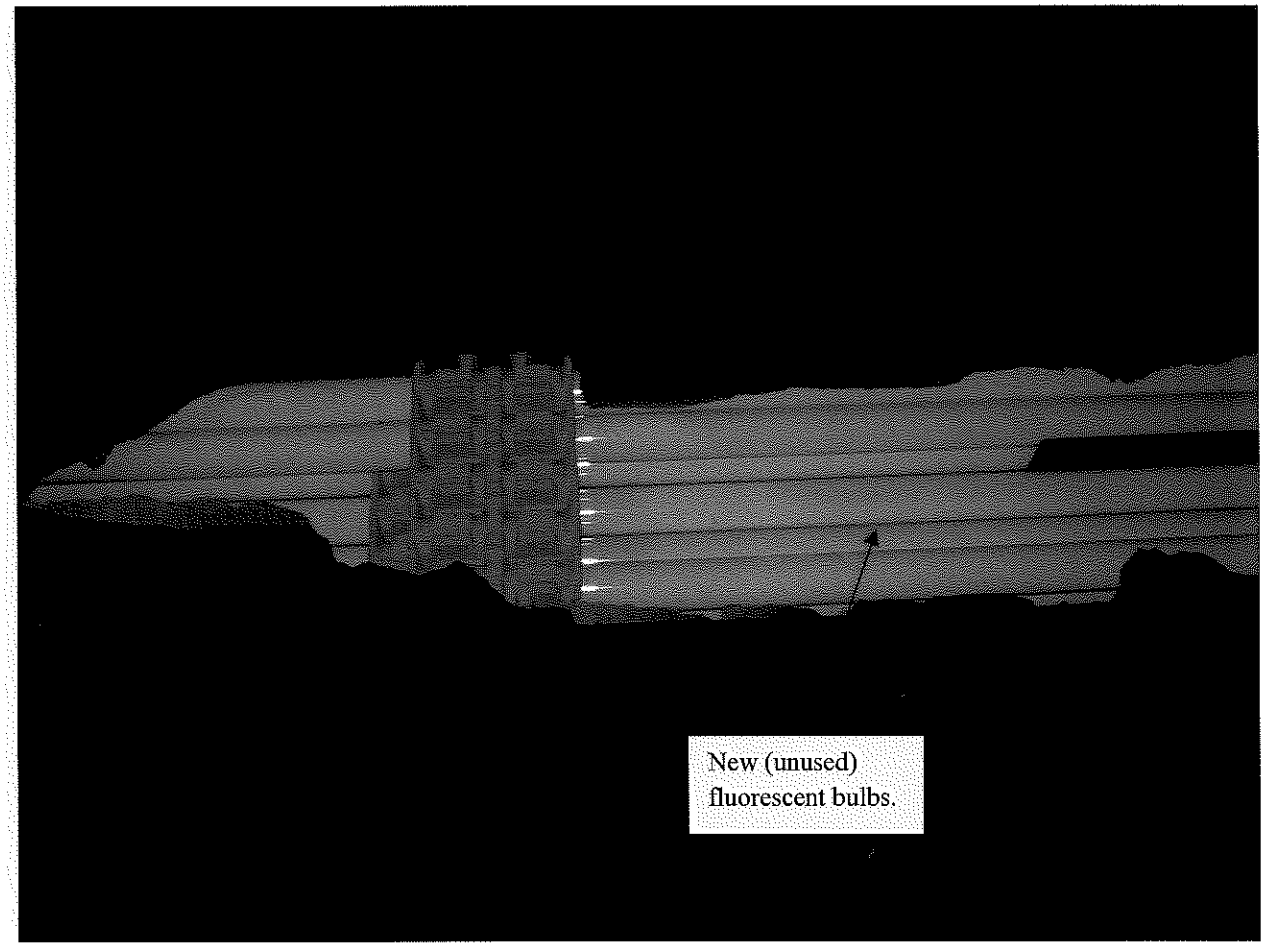

PHOTO 9

PHOTO 10

PHOTO 11